

Deverie J. Christensen, Esq.
Nevada State Bar No. 6596
Cayla J. Witty, Esq.
Nevada State Bar No. 12897
JACKSON LEWIS P.C.
300 South Fourth Street, Suite 900
Las Vegas, Nevada 89101
Tel: (702) 921-2460
Email: deverie.christensen@jacksonlewis.com
cayla.witty@jacksonlewis.com

Attorneys for Defendant
Wynn Las Vegas, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JENNIFER BANDIERO, individually,

Plaintiff,

vs.

WYNN LAS VEGAS, LLC, a Nevada limited-
liability company; DOES I through X; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:23-cv-02115-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
MOTIONS FOR SUMMARY
JUDGMENT AND RELATED
DEADLINES**

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Jennifer Bandiero (“Plaintiff”), through her counsel Maier Gutierrez & Associates, and Defendant Wynn Las Vegas, LLC (“Defendant”), through its counsel Jackson Lewis P.C., as follows:

1. Pursuant to the Discovery Plan and Scheduling Order, the last day to file dispositive motions is Wednesday, December 4, 2024. ECF No. 21.

2. Consequently, applying the deadlines under Local Rule 7-2(b), responses to dispositive motions will be due 21 days later, which falls on December 25, 2024, Christmas Day. Further, replies will be due 14 days after December 25, on Wednesday, January 8, 2025, which is, and the first week in January following the New Year’s holiday.

3. Thus, the deadlines fall during the Christmas, Hannukah, and other yearend holidays, and Counsels for both parties desire, respectfully, to take time away from work to be with their families during these holidays.

4. Moreover, Defense Counsel is preparing for a week-long trial scheduled to commence on December 9, 2024, which has taken substantial time over the past few weeks and made it challenging to meet other deadlines, including the dispositive motions deadline on December 4, 2024.

5. Accordingly, the parties have stipulated and agreed to extend the deadlines to file dispositive motions, responses, and replies as follows:

a. Dispositive motions will be due on **December 20, 2024**;

b. Responses to dispositive motions will be due on **January 17, 2025**; and,

c. Replies will be due on **January 31, 2025**.

6. This is the first request to extend the deadline to file motions for summary judgment.

7. This stipulation and order is sought in good faith and not for the purpose of delay.

Dated this 2nd day of December, 2024.

MAIER GUTIERREZ & ASSOCIATES

JACKSON LEWIS P.C.

/s/ Danielle J. Barraza

/s/ Cayla J. Witty

JASON R. MAIER, ESQ.

DEVERIE J. CHRISTENSEN, ESQ.

Nevada Bar No. 8557

Nevada Bar No. 6596

DANIELLE J. BARRAZA, ESQ.

CAYLA J. WITTY, ESQ.

Nevada Bar No. 13822

Nevada Bar No. 12897

8816 Spanish Ridge Avenue

300 S. Fourth Street, Suite 900

Las Vegas, Nevada 89148

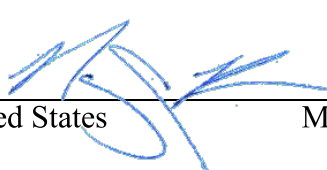
Las Vegas, Nevada 89101

Attorneys for Plaintiff
Jennifer Bandiero

Attorneys for Defendant
Wynn Las Vegas, LLC

ORDER

IT IS SO ORDERED:


United States

Magistrate Judge

Dated: December 3, 2024